

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Dennis W. Tyndall

Debtor

Case No. 1:23-bk-02289-HWV

Chapter 13

MOTION TO EXTEND TIME
FOR FILING ALL REMAINING DOCUMENTS

AND NOW, this 20th day of October, 2023, come the above Debtor, by his counsel, CGA Law Firm, E. Haley Rohrbaugh, Esquire and files the within Motion averring that:

1. The within Motion is brought pursuant to Bankruptcy Rule 1007 in that it seeks to extend the time in which the Debtor must file all remaining documents.
2. The above-captioned case is was filed as an emergency voluntary Chapter 13 petition on October 4, 2023 for the purpose of stopping a levy against clients bank account .
3. Debtor is still attempting to gather all income documentation needed to complete the Schedules and Petition, additional time is necessary to allow Debtor to locate and bring in the needed income and tax documentation.
4. For the reasons, the Debtor respectfully request an extension until November 18, 2023 to file all outstanding documents.

Respectfully submitted,
CGA Law Firm

By: /s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. ID No. 323803
135 N. George St. York, PA 17401
Telephone: 717-848-4900
(Counsel for Debtor)

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2023, a true and correct copy of the foregoing Motion to Extend Time for all remaining documents was or will be sent to the following by CM / ECF:

Office of the U.S. Trustee

Jack N. Zaharopoulos, Esquire,
Chapter 13 Trustee

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire

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ORDER GRANTING MOTION TO EXTEND TIME TO
FILE ALL REMAINING DOCUMENTS

AND NOW, upon consideration of the Motion filed by the Debtor seeking to have the time in which to file all remaining documents extended, it is hereby

ORDERED that the time within which the Debtor must file all remaining documents be extended an additional thirty (30) days.

BY THE COURT,